

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**ROBERT E. MORLEY, JR., and
REM HOLDINGS 3, LLC**

Plaintiffs,

vs.

**SQUARE, INC., JACK DORSEY, and
JAMES MCKELVEY, JR.**

Defendants.

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Civil Action No. 4:14-cv-00172-CDP

JURY TRIAL DEMANDED

DECLARATION OF DR. ROBERT E. MORLEY, JR.

1. I, Robert E. Morley, Jr., submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could and would competently testify to the truth of each statement herein.
2. I was born, raised, live, and work in Missouri.
3. On June 24, 2009, in St. Louis, James McKelvey, Jr. told me that Jack Dorsey had incorporated a company in Delaware, and that Dorsey intended to unilaterally dictate equity ownership in that company.
4. On June 24, 2009, James McKelvey, Jr. indicated his intent to acquiesce in Jack Dorsey's decision because it was his best chance to get "filthy rich."
5. On June 17, 2009, I was in St. Louis, Missouri.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 5, 2014


Dr. Robert E. Morley, Jr.